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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 SOUTHERN DIVISION**

RENO MAY, an individual;  
 ANTHONY MIRANDA, an individual;  
 ERIC HANS, an individual; GARY  
 BRENNAN, an individual; OSCAR A.  
 BARRETTO, JR., an individual;  
 ISABELLE R. BARRETTO, an  
 individual; BARRY BAHRAMI, an  
 individual; PETE STEPHENSON, an  
 individual; ANDREW HARMS, an  
 individual; JOSE FLORES, an  
 individual; DR. SHELDON HOUGH,  
 DDS, an individual; SECOND  
 AMENDMENT FOUNDATION; GUN  
 OWNERS OF AMERICA; GUN  
 OWNERS FOUNDATION; GUN  
 OWNERS OF CALIFORNIA, INC.;  
 THE LIBERAL GUN CLUB, INC.; and  
 CALIFORNIA RIFLE & PISTOL  
 ASSOCIATION, INCORPORATED,,

Plaintiffs,

v.

ROBERT BONTA, in his official  
 capacity as Attorney General of the  
 State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF PETE  
 STEPHENSON IN SUPPORT OF  
 PLAINTIFFS' MOTION FOR  
 PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
 Hearing Time: 1:30 p.m.  
 Courtroom: 9 B  
 Judge: Hon. Cormac J. Carney

**DECLARATION OF PETE STEPHENSON**

1  
2       1. I, Pete Stephenson, am a plaintiff in the above-entitled action. I make this  
3 declaration of my own personal knowledge and, if called as a witness, I could and  
4 would testify competently to the truth of the matters set forth herein.

5       2. I am a current resident of Alameda County, California.

6       3. I am a law-abiding adult who is not prohibited from owning firearms under  
7 the laws of the United States of America or the state of California. I have never  
8 been found by any law enforcement agency, any court, or any other government  
9 agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a  
10 member of the California Rifle & Pistol Association, another plaintiff in this matter.

11       4. I have a valid and current California concealed carry weapon ("CCW")  
12 permit issued by the Alameda County Sheriff's Department.

13       5. I am a married father of two children that lives and works in the City of  
14 Livermore. I was born and raised in California and am a veteran who was  
15 honorably discharged with the E-4 rank in the mid-2000s. I applied for an Alameda  
16 County CCW permit on the night of the *Bruen* ruling and was issued the permit  
17 earlier this year. I regularly carry for self-defense of myself and my  
18 family wherever it is lawful to do so.

19       6. While I live in Livermore, I am a frequent visitor to San Francisco with my  
20 family. We visit Fisherman's Wharf, museums, parks, and other popular  
21 destinations. While there, I and my family will visit banks (e.g. to withdraw cash  
22 from an ATM), dine in restaurants, go shopping, and otherwise enter typical  
23 privately-owned businesses that are open to the public like shops, galleries, and so  
24 forth, just as we do back home in Livermore.

25       7. On these regular trips to San Francisco, the easiest way to travel is often by  
26 BART from the Dublin/Pleasanton station near Livermore to stations in San  
27 Francisco and back. SB 2 will make this impossible if I want to exercise my right to  
28 carry, because it bans carry on public transportation.

1       8. Prior to SB 2, I only didn't carry my pistol when planning on going to one of  
2 the few places where carry was not permitted, such as a school or courthouse, or  
3 when I intended to have a drink with dinner.

4       9. Because SB 2 will prohibit me from carrying in many places where I am  
5 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus  
6 my right to be armed for self-defense in public, will be outright eliminated in nearly  
7 all common contexts. All of the places I listed above will be off-limits for carry  
8 now, with the exception perhaps of any businesses that choose to put up a sign  
9 affirmatively allowing those with CCW permits to carry within them (which will  
10 certainly not be common here in a region quite hostile to gun rights).

11       10. SB 2 will essentially destroy my constitutional right to carry, as so few of  
12 the places I go to on a daily basis will permit carry, and I don't want to expose my  
13 firearm to theft by constantly leaving it in my vehicle. And when I am using public  
14 transportation, there is no vehicle to store it in anyway. But for SB 2 and my fear of  
15 criminal prosecution, I would continue to carry in all of these places as I did before  
16 the law took effect.

17       I declare under penalty of perjury that the foregoing is true and correct.  
18 Executed on September 29, 2023.

19  
20  
21 

22       Pete Stephenson  
23       Declarant  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**  
**IN THE UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

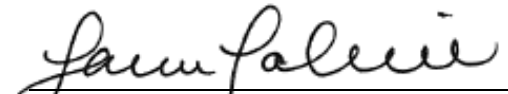
**DECLARATION OF PETE STEPHENSON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin